

F I L E D
Clerk
District Court

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FEB 14 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

Attorney for Saipan Handicraft.

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

SAIPAN HANDICRAFT,	Civil Action No. 05-0040
vs.	
MICRONESIA WOODCRAFT ENT.,	
INC.; TIRZO J. ADRIATICO,	
individually and as President of	
Micronesia Woodcraft Ent., Inc.;	
and JOHN DOES 1-40,	
Defendants.	

PLAINTIFF'S INITIAL DISCLOSURES

Date: February 14, 2006
Time: 10:00 a.m.
Judge: Honorable Alex R. Munson

Pursuant to Fed.R.Civ.P. 26(a)(1) and LR 16.2CJ(d), Plaintiff hereby makes the following

initial disclosures:

A. Persons Likely to Have Discoverable Information

1. Officers, Directors and Managers of Defendant Micronesia Woodcraft Ent., Inc., Tirzo J. Adriatico, their buyers, employees, and distributors.
2. Rodrigo Capati, Adela Capati, Rodel Capati of Plaintiff Saipan Handicraft, their buyers, employees, and distributors.

Plaintiff's Initial Disclosures -- Page 1 of 3

ORIGINAL

3. Dr. William Vitarelli.

4. Augustine T. Camacho.

5. Manuel Kisa.

6. Frank Pangelinan.

7. Owners and employees of Saipan, Rota, Guam and Japanese stores selling identical and other style bayogo dolls, including but not limited to DFS, Joeten, Hakubotan, Mama's Stores, LA Gift Shop, 123 Discount Stores, ABC Stores, Tamaya Gift Shop, the gift shop in World Resort, Rota Pau Pau Hotel, Maui Divers, Princess Corp. and Shopping Paradise.

8. Mr. Keizo Ishida of Anies Imuza.

9. Joe Cabrera and Jim Davies, investigators.

Plaintiff reserves the right to amend and supplement this list in accordance with Fed.R.Civ.P. 26(e) as formal discovery commences and further information is uncovered. Further, this list does not include impeachment witnesses.

B. Documents, Data Compilations, and Tangible Things

1. Employment records of Mr. Adriatico from his years working for Plaintiff.
2. Copies of sales receipts, invoices, and correspondence and other written documentation evidencing sales and production by Saipan Handicraft.
3. Copies of sales receipts, invoices, and correspondence and other written and printed documentation evidencing sales, ads and production by Micronesia Woodcraft Ent, and other defendants.
4. Corporate, bank, employment, business, tax records of Micronesia Woodcraft Ent.

and other defendants.

Plaintiff reserves the right to amend and supplement this list in accordance with Fed.R.Civ.P. 26(e) as formal discovery commences and further documents are uncovered. Further, this list does not include impeachment documents or documents that are not in our possession.

C. Computation of Damages

At this early stage as investigation continues and more and more sales of offending dolls are discovered, damages are difficult to compute with any finality except to say that Plaintiff has been damages in amounts believed to be greater than one million dollars. There are obvious damages to goodwill, damages from the loss of quality control, lost sales, and reputation. Plaintiff, however, is making progress in its investigations and reserves the right to present its damage computations in detail once and all data is properly collected and compiled and numbers are more able to be stated with certainty.

D. Insurance Agreement

Currently, Plaintiff is not aware of any insurance agreements which might cover part or all of any judgment entered in this action. In the event a policy is discovered or discovered to be applicable, a copy will be provided to the Defendants.

Respectfully submitted this 2-14-06.


F. MATTHEW SMITH
Attorney for Plaintiff